

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 14-20034**
Janus Aguila : **Chapter 13**
: **Judge Ashely M. Chan**
Debtor(s). : * * * * *

CERTIFICATE OF DEFAULT

Now comes Wells Fargo Bank, N.A., its successor and assigns (hereinafter, "Creditor") by and through counsel, and certifies to this Court that Janus Aguila ("Debtor") has failed to comply with the Order approving the stipulation dated December 27, 2016, a copy of which is attached hereto as Exhibit "A", by failing to make timely payments in accordance with the stipulation. Pursuant to the Order, the automatic stay will terminate upon the filing of the Certificate of Default.

Creditor hereby avers that Debtor is delinquent for the June 2017 payment and for all arrears that were due thereafter. Further, pursuant to the terms of the stipulation, Creditor provided Debtor and their Counsel with a Notice of Default on September 1, 2017, allowing Debtor ten (10) days to cure the default. A copy of said default letter is attached hereto as Exhibit "B". Ten (10) days have passed and the default has not been cured.

WHEREFORE, upon the filing of this Certificate of Default, Creditor requests that the Court enter an order terminating the automatic stay.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)
Kimberly A. Bonner (89705)
Adam B. Hall (323867)
Sarah E. Barngrover (323972)
Manley Deas Kochalski LLC

P.O. Box 165028
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Attorneys for Creditor
The case attorney for this file is Karina
Velter.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Certificate of Default was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, 1234 Market Street, Suite 1813, Philadelphia, PA
19107

Brad J. Sadek, Attorney for Janus Aguila, Sadek and Cooper, 1315 Walnut Street,
Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on October 10,
2017:

Janus Aguila, 2268 Dermond Avenue, Upper Darby, PA 19082

Janus Aguila and Cristobal Aguila, 363 Edmonds Avenue, Drexel Hill, PA 19026

Wells Fargo Home Mortgage, P.O. Box 10368, Des Moines, IA 50306

DATE: 10/10/2017

/s/ Karina Velter

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Adam B. Hall (323867)
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